

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

INTERFOCUS INC., a California
Corporation

Plaintiff,

v.

The Defendants Identified in SCHEDULE A,

Defendant.

Case No.: 1:22-cv-2259

DECLARATION OF ROBERT ROSENBLUM IN SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY RESTRAINING ORDER, INCLUDING A TEMPORARY INJUNCTION, A TEMPORARY ASSET RESTRAINT, AND EXPEDITED DISCOVERY

DECLARATION OF ROBERT ROSENBLUM

I, Robert Rosenblum, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am a senior litigation paralegal working for the law firm Rimon P.C., counsel of record for InterFocus, Inc. herein. I work and live in Sacramento, California. I have been a paralegal for 13 years. In that capacity, I was asked to gather, and have gathered, supervised others who gathered, and collaborated with others in gathering, materials I understand are relevant to this action, which operates a website site at PatPat.com. Those materials include copies of Copyright Registrations as received by Interfocus, deposit copies of works submitted with copyright applications submitted to the Copyright Office, screenshots of pages taken from our client InterFocus' website "PatPat.com" that depict goods that have been registered for copyright with the U.S. Copyright Office, and screenshots of pages taken from the Defendants' website that I am informed and believe are relevant to this action.

3. I also have organized the materials described above in the manner set forth below, which I hope will allow the Court to more easily understand the nature of Defendants' conduct relevant to this litigation. The materials have been organized around the copyrights InterFocus alleges Defendants have infringed, as set forth below.

4. The following records are related to what InterFocus calls PatPat product #17237031. A true and correct copy of Interfocus Copyright Registration # VA0002282656 is attached as **Exhibit 1A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to that Copyright Registration are attached as **Exhibit 1B**. True

and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 1C**. Please note, **Exhibit 1C** contains many additional pages to maintain a complete record, however the most relevant screenshots can be found on pp. 2, 12, 18, and 32. For the remaining exhibits containing screenshots from InterFocus' website attached to this declaration, I have removed similar extraneous pages for ease of reference. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002282656 are attached as **Exhibit 1D**. For true and correct copies of photos of the physical products as received from Defendant, please see Declaration of Amanda Richardson-Golden (**Golden Decl. Ex. 3**).

5. The following records are related to PatPat product #17296179. A true and correct copy of Interfocus Copyright Registration # VA0002266891 is attached as **Exhibit 2A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002266891 are attached as **Exhibit 2B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 2C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002266891 are attached as **Exhibit 2D**. For true and correct copies of photos of the physical products as received from Defendants, please see **Golden Decl. Ex. 4**.

6. The following records are related to PatPat product #17296179. A true and correct copy of Interfocus Copyright Registration # VAu001420322 is attached as **Exhibit 3A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VAu001420322 are attached as **Exhibit 3B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 3C**.

True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VAu001420322 are attached as **Exhibit 3D**. For true and correct copies of photos of the physical products as received from Defendants, please see **Golden Decl. Ex. 4**.

7. The following records are related to PatPat product #17300843. A true and correct copy of Interfocus Copyright Registration # VA0002282229 is attached as **Exhibit 4A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002282229 are attached as **Exhibit 4B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002282229 are attached as **Exhibit 4D**. For true and correct copies of photos of the physical products as received from Defendants, please see **Golden Decl. Ex. 5**.

8. The following records are related to PatPat product #17272545. A true and correct copy of Interfocus Copyright Registration # VA0002282931 is attached as **Exhibit 5A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002282931 are attached as **Exhibit 5B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 5C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002282931 are attached as **Exhibit 5D**.

9. The following records are related to PatPat product #17273247. A true and correct copy of Interfocus Copyright Registration # VAu001404114 is attached as **Exhibit 7A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation

to Copyright Registration # VAu001404114 are attached as **Exhibit 7B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 7C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VAu001404114 are attached as **Exhibit 7D**.

10. The following records are related to PatPat product #17260034. A true and correct copy of Interfocus Copyright Registration # VA0002282229 is attached as **Exhibit 8A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002282229 are attached as **Exhibit 8B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 8C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002282229 are attached as **Exhibit 8D**.

11. The following records are related to PatPat product #17310814. A true and correct copy of Interfocus Copyright Registration # VA0002259775 is attached as **Exhibit 9A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002259775 are attached as **Exhibit 9B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002259775 are attached as **Exhibit 9D**.

12. The following records are related to PatPat product #17310814. A true and correct copy of Interfocus Copyright Registration # VA0002266425 is attached as **Exhibit 10A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002266425 are attached as **Exhibit 10B**. True and

correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 10C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002266425 are attached as **Exhibit 10D**.

13. The following records are related to PatPat product #17241548. A true and correct copy of Copyright Registration # VA0002289507 is attached as **Exhibit 11A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289507 are attached as **Exhibit 11B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289507 are attached as **Exhibit 11D**.

14. The following records are related to PatPat product #17240521. A true and correct copy of Copyright Registration # VA0002283332 is attached as **Exhibit 12A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002283332 are attached as **Exhibit 12B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002283332 are attached as **Exhibit 12D**.

15. The following records are related to PatPat product #17327020. A true and correct copy of Interfocus Copyright Registration # VA0002267346 is attached as **Exhibit 13A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002267346 are attached as **Exhibit 13B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 13C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002267346 are

attached as **Exhibit 13D**.

16. The following records are related to PatPat product #17314065. A true and correct copy of Interfocus Copyright Registration # VA0002266770 is attached as **Exhibit 14A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002266770 are attached as **Exhibit 14B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 14C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002266770 are attached as **Exhibit 14D**.

17. The following records are related to PatPat product #17314069. A true and correct copy of Interfocus Copyright Registration # VA0002262268 is attached as **Exhibit 15A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002262268 are attached as **Exhibit 15B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 15C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002262268 are attached as **Exhibit 15D**.

18. The following records are related to PatPat product #17314069. A true and correct copy of Interfocus Copyright Registration # VA0002289508 is attached as **Exhibit 16A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 16B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 16C**. True and correct copies of screenshots of Defendants' website showing products

which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 16D**.

19. The following records are related to PatPat product #17315607. A true and correct copy of Interfocus Copyright Registration # VA0002261342 is attached as **Exhibit 17A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002261342 are attached as **Exhibit 17B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 17C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002261342 are attached as **Exhibit 17D**.

20. The following records are related to PatPat product #17320439. A true and correct copy of Interfocus Copyright Registration # VA0002262261 is attached as **Exhibit 18A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002262261 are attached as **Exhibit 18B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 18C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002262261 are attached as **Exhibit 18D**.

21. The following records are related to PatPat product #17320439. A true and correct copy of Interfocus Copyright Registration # VA0002289508 is attached as **Exhibit 19A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 19B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached

as **Exhibit 19C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 19D**.

22. The following records are related to PatPat product #17326444. A true and correct copy of Interfocus Copyright Registration # VA0002267269 is attached as **Exhibit 20A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002267269 are attached as **Exhibit 20B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 20C**. True and correct copies of screenshots of Defendant's website showing products which I understand as infringing Interfocus Copyright Registration # VA0002267269 are attached as **Exhibit 20D**.

23. The following records are related to PatPat product #17326444. A true and correct copy of Interfocus Copyright Registration # VA0002289508 is attached as **Exhibit 21A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 21B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 21C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 21D**.

24. The following records are related to PatPat product #17330374. A true and correct copy of Interfocus Copyright Registration # VA0002267274 is attached as **Exhibit 22A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002267274 are attached as **Exhibit 22B**. True and

correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 22C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002267274 are attached as **Exhibit 22D**.

25. The following records are related to PatPat product #17330374. A true and correct copy of Interfocus Copyright Registration # VA0002289508 is attached as **Exhibit 23A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 23B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 23C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 23D**.

26. The following records are related to PatPat product #17348740. A true and correct copy of Interfocus Copyright Registration # VA0002273862 is attached as **Exhibit 24A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002273862 are attached as **Exhibit 24B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 24C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002273862 are attached as **Exhibit 24D**.

27. The following records are related to PatPat product #17348740. A true and correct copy of Copyright Registration # VA0002289508 is attached as **Exhibit 25A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to

Copyright Registration # VA0002289508 are attached as **Exhibit 25B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 25C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 25D**.

28. The following records are related to PatPat product #17353405. A true and correct copy of Copyright Registration # VA0002289508 is attached as **Exhibit 26A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 26B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 26C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 26D**.

29. The following records are related to PatPat product #17355466. A true and correct copy of Copyright Registration # VA0002289508 is attached as **Exhibit 27A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 27B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 27C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 27D**.

30. The following records are related to PatPat product #17362916. A true and correct copy of Copyright Registration # VA0002287366 is attached as **Exhibit 28A**. True and correct

copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002287366 are attached as **Exhibit 28B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 28C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002287366 are attached as **Exhibit 28D**.

31. The following records are related to PatPat product #17364687. A true and correct copy of Copyright Registration # VA0002283150 is attached as **Exhibit 29A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002283150 are attached as **Exhibit 29B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 29C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002283150 are attached as **Exhibit 29D**.

32. The following records are related to PatPat product #17366133. A true and correct copy of Copyright Registration # VA0002276650 is attached as **Exhibit 30A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002276650 are attached as **Exhibit 30B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 30C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002276650 are attached as **Exhibit 30D**.

33. The following records are related to PatPat product #17366133. A true and correct

copy of Copyright Registration # VA0002289508 is attached as **Exhibit 31A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 31B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 31C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 31D**.

34. The following records are related to PatPat product #17372170. A true and correct copy of Copyright Registration # VA0002287498 is attached as **Exhibit 32A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002287498 are attached as **Exhibit 32B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 32C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002287498 are attached as **Exhibit 32D**.

35. The following records are related to PatPat product #17310049. A true and correct copy of Copyright Registration # VA0002266527 is attached as **Exhibit 33A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002266527 are attached as **Exhibit 33B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 33C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002266527 are attached as **Exhibit 33D**.

36. The following records are related to PatPat product #17310049. A true and correct copy of Copyright Registration # VA0002289508 is attached as **Exhibit 34A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 34B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 34C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 34D**.

37. The following records are related to PatPat product #17256792. A true and correct copy of Copyright Registration # VA0002289507 is attached as **Exhibit 35A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289507 are attached as **Exhibit 35B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 35C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289507 are attached as **Exhibit 35D**.

38. The following records are related to PatPat product #17258714. A true and correct copy of Copyright Registration # VA0002289507 is attached as **Exhibit 36A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289507 are attached as **Exhibit 36B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 36C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289507 are attached as

Exhibit 36D.

39. The following records are related to PatPat product #17296789. A true and correct copy of Copyright Registration # VA0002267295 is attached as **Exhibit 37A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002267295 are attached as **Exhibit 37B**. True and correct copies of screenshots showing the relevant products on InterFocus' website are attached as **Exhibit 37C**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002267295 are attached as **Exhibit 37D**.

40. The following records are related to PatPat product #17271776. A true and correct copy of Copyright Registration # VAu001404200 is attached as **Exhibit 39A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VAu001404200 are attached as **Exhibit 39B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VAu001404200 are attached as **Exhibit 39D**.

41. The following records are related to PatPat product #17310037. A true and correct copy of Copyright Registration # VA0002266527 is attached as **Exhibit 41A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002266527 are attached as **Exhibit 41B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002266527 are attached as **Exhibit 41D**.

42. The following records are related to PatPat product #17310037. A true and correct copy of Copyright Registration # VA0002289508 is attached as **Exhibit 42A**. True and correct

copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289508 are attached as **Exhibit 42B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289508 are attached as **Exhibit 42D**.

43. The following records are related to PatPat product #17250748. A true and correct copy of Copyright Registration # VA0002289507 is attached as **Exhibit 43A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002289507 are attached as **Exhibit 43B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002289507 are attached as **Exhibit 43D**.

44. The following records are related to PatPat product #17283410. A true and correct copy of Copyright Registration # VA0002282229 is attached as **Exhibit 44A**. True and correct copies of certain deposit photographs submitted to the U.S. Copyright Office in relation to Copyright Registration # VA0002282229 are attached as **Exhibit 44B**. True and correct copies of screenshots of Defendants' website showing products which I understand as infringing Interfocus Copyright Registration # VA0002282229 are attached as **Exhibit 44D**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 3rd day of May, 2022 at Sacramento, California.



Robert Rosenblum